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July 22, 2005

**VIA ELECTRONIC FILING AND FIRST CLASS MAIL**

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110


Re: Bay State's Information Requests of Attorney General, D.T.E. 05-27

Dear Ms. Cottrell:

Enclosed please find an original and six (6) copies of Bay State Gas Company's Second Set of Information Requests propounded upon the Attorney General in this proceeding.

Thank you for your attention to this matter.

Very truly yours,

  
Patricia M. French

cc: Caroline O'Brien Bulger, Esq., Hearing Officer,  
A. John Sullivan, DTE (7 copies)  
Andreas Thanos, Assistant Director, Gas Division  
Alexander Cochis, Assistant Attorney General (4 copies)  
Paul R. Osborne, Assistant Director, Rates and Requirements Division  
Service List

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**BAY STATE GAS COMPANY**

**D.T.E. 05-27**

**BAY STATE GAS COMPANY'S  
SECOND SET OF INFORMATION REQUESTS  
PROPOUNDED ON  
THE ATTORNEY GENERAL**

Pursuant to the procedural schedule established for this proceeding, Bay State Gas Company ("Bay State") hereby submits the following information requests relative to the Testimonies of Jacob (Jack) Pous ("Pous Testimony") and Jon Cavallo ("Cavallo Testimony"), and separately, the filed position of the Office of the Attorney General, on behalf of Tom Reilly, Attorney General of the Commonwealth.

**INSTRUCTIONS**

The following instructions apply to this set of requests and all subsequent requests issued by Bay State during the proceeding.

1. Each request should be answered in writing on a separate, three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. These requests shall be deemed continuing so as to require further supplemental responses if the Attorney General or any of its witnesses receives or generates additional information within the scope of these responses between the time of the original response and the close of the record in this proceeding.
3. The term "provide complete and detailed documentation" means:  
  
Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
4. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

5. If any one of these requests is ambiguous, notify Bay State so that the request may be clarified prior to the preparation of a written response.

REQUESTS

- |            |   |
|------------|---|
| BSG-AG-2-1 | Please provide copies of all prior testimony submitted to any court or regulatory agency on the subjects on which Mr. Pous has filed testimony in this proceeding.  |
| BSG-AG-2-2 | Please provide all notes, workpapers, spreadsheets, calculations or reports used, prepared or relied on by Mr. Pous in preparing his testimony, whether created by Mr. Pous or anyone else.   |
| BSG-AG-2-3 | (a) Please provide a list of all articles or papers authored, published or prepared by Mr. Pous on the subjects contained in his testimony. (b) Provide copies of all articles or papers listed in BSG-AG-2-3(a).   |
| BSG-AG-2-4 | Please provide copies of all regulatory agency or court decisions, orders or rulings that address any testimony prepared or submitted by Mr. Pous, whether the subject of this proceeding or not.   |
| BSG-AG-2-5 | Please list the other principals at Diversified Utility Consultants and indicate the areas upon which each is qualified to testify.   |
| BSG-AG-2-6 | Has Mr. Pous participated in any proceeding where a steel mains replacement program was approved by order or settlement by a public utility commission for use by a natural gas distribution company? If so, did that order or orders approve an adjustment mechanism by which the cost of such mains replacement program would be recovered? |
| BSG-AG-2-7 | Please list each and every NACE certification attained by Mr. Cavallo.  |
| BSG-AG-2-8 | Please refer to the Cavallo Testimony at 3, lines 8-9. By indicating that Mr. Cavallo "specializ[es] in corrosion mitigation and protective coatings," is it correct that Mr. Cavallo specializes in paint coatings?  |
| BSG-AG-2-9 | Please refer to the Cavallo Testimony at 3, lines 16 and 17. Please define the acronyms ASME, ASTM, NACE, NSPE, ASTM Committee D-33.  |

- BSG-AG-2-10      Please refer to the Cavallo Testimony at 3, line 17. Please provide the organization charter and official purpose of the SSPC.
- BSG-AG-2-11      Please refer to the Cavallo Testimony at 3, lines 21-23. Please define "industrial surface preparation and painting."
- BSG-AG-2-12      Please refer to the Cavallo Testimony at 4, lines 4-11. Please provide Mr. Cavallo's professional vitae and list in particular the dates and descriptions of actual assignments described in that paragraph, including the names of each client for whom Mr. Cavallo's work was undertaken.
- BSG-AG-2-13      Please refer to the Cavallo Testimony at 4, lines 16-21. Please define "atmospheric and buried structures" and describe with particularity each and every such structure (by date, name, location and client) for which Mr. Cavallo advised, evaluated or developed coating specifications, as set forth in that paragraph.
- BSG-AG-2-14      Please refer to the Cavallo Testimony at 5, lines 2-9. Provide copies of all certificates listed here, and list separately the dates of attendance and describe with particularity the course curriculum.
- BSG-AG-2-15      Please provide copies of all prior testimony submitted to any court or regulatory agency on the subjects, or related subjects on which Mr. Cavallo has filed testimony in this proceeding.
- BSG-AG-2-16      Please provide all notes, workpapers, spreadsheets, calculations or reports used, prepared or relied on by Mr. Cavallo in preparing his testimony, whether created by Mr. Cavallo or anyone else.
- BSG-AG-2-17      (a) Please provide a list of all articles or papers authored, published or prepared by Mr. Cavallo on the subjects contained in his testimony. (b) Provide copies of all such articles or papers listed in BSG-AG-2-17(a).
- BSG-AG-2-18      Please provide copies of all regulatory agency or court decisions, orders or rulings that address any testimony prepared or submitted by Mr. Cavallo, whether the subject of this proceeding or not.
- BSG-AG-2-19      State the number of natural gas distribution or pipeline companies for whom Mr. Cavallo has worked as a consulting engineer and describe the activities and assessments undertaken on behalf of each.

- BSG-AG-2-20      Provide copies of all RFP's, lists of bidding participants, and resultant consulting contracts for each of the consultants hired by the Attorney General in this proceeding, and for whom testimony has been filed. This request does not include Mr. Newhard.
- BSG-AG-2-21      Refer to the Cavallo Testimony at page 6. Indicate by date, Company, location and description of activity undertaken, all other natural gas distribution system pipe excavations that Mr. Cavallo has witnessed throughout his career.
- BSG-AG-2-22      Refer to the Cavallo Testimony at 6-7. Are Mr. Cavallo's "field observations" based on the two excavations he witnessed?
- BSG-AG-2-23      Refer to the Cavallo Testimony at 8, line 12. (a) Describe how a pipe buried under the ground can be protected from all corrosive forces. (b) Describe the natural gas distribution industry standard construction techniques for excavating, trenching and burial of natural gas distribution mains and services, and related infrastructure, from (i) 1900-1920, (ii) 1920-1950, (iii) 1950-1970 and (iv) 1970-1980. (c) Has there been a change in the standard techniques used by the natural gas distribution industry since 1980?
- BSG-AG-2-24      Refer to the Cavallo Testimony at 8, line 23. Describe in detail why Mr. Cavallo believes that RJ Rudden engaged Heath Associates, and why Mr. Cavallo believes Heath Associates is a "leak detection company."
- BSG-AG-2-25      Refer to the Cavallo Testimony at 8, lines 15-18. If the Company now cathodically protects all newly installed coated steel mains, and has done so since 1971 in compliance with federal law, or it installs plastic mains, how is it possible that the Company may "unwittingly replicate conditions that will cause future corrosion and leak problems in its repaired and replaced infrastructure?"
- BSG-AG-2-26      Please refer to the Cavallo Testimony at 9, lines 18-20. (a) Define "defense-in-depth." (b) Provide examples of the use of this phrase in natural gas distribution industry literature. (c) Provide copies of all "root cause analyses" conducted by Mr. Cavallo on corrosion in underground unprotected coated and bare mains and pipes of natural gas distribution

utility systems and (d) name the natural gas distribution companies for whom such root cause analyses were performed.

- BSG-AG-2-27      Please refer to the Cavallo Testimony at 9, lines 20-22. How does what is described here differ if at all with the activities undertaken by Bay State on a regular basis since August 1, 1971?
- BSG-AG-2-28      Please refer to the Cavallo Testimony at 10, lines 1-10. Confirm Mr. Cavallo's understanding that Bay State's underground distribution system also employs mains of cathodically protected coated steel, plastic, cast iron and wrought iron, in addition to unprotected coated steel and bare steel.
- BSG-AG-2-29      Please refer to the Cavallo Testimony at 11, line 9. Is the coating a "film?" Describe the thickness of the coatings used to protect steel pipes and describe in detail how the thickness of those coatings have changed since they were first introduced. Describe the materials used for coating natural gas distribution mains, if the materials used have changed since coated steel was first introduced, and how such coating was and is applied to the mains and services, describing the changes in any such techniques (if any).
- BSG-AG-2-30      Refer to the response to BSG-AG-2-30. Describe how the coated mains in Bay State's territory differ from those used by any other natural gas distribution utility. Describe how the excavation procedures for any other natural gas distribution utility differ from those employed by Bay State for the early (pre-1970) entrenchment of bare or unprotected coated steel pipes.
- BSG-AG-2-31      Has Mr. Cavallo specifically developed protective coating specifications for bare and unprotected coated *steel natural gas distribution mains & services installed between 1920 and 1970*. If the answer is yes, what U.S. natural gas distribution or transmission companies he has specifically done this for?
- BSG-AG-2-32      Refer to the Cavallo Testimony at 14, line 20-22 and the response to BSG-AG-2-32. Of those companies Mr. Cavallo has performed root cause analysis, identify the top five root causes which typically contribute to increasing leak rates in existing underground natural gas transmission and distribution company systems.

- BSG-AG-2-33      Has Mr. Cavallo reviewed each and every information request response sponsored by Mr. Cote in this proceeding (except those related to plant investment, GTI or transfers of property) in advance of preparing his testimony?
- BSG-AG-2-34      Please refer to the Cavallo Testimony at p. 14, line 10. Mr. Carvallo suggests that the number of leaks from 2000 to 2004 exhibits a progressively downward trend. Is Bay State's analysis of twenty years worth of leak data versus Mr. Cavallo's five years worth of leak data more indicative of leak trends? If not, explain in detail why not. Provide all supporting analyses.
- BSG-AG-2-35      Please refer to the Cavallo Testimony at p. 14, line 10. Comment on the following: Bay State's progressively downward trend in number of main leaks during 2000-2004 is attributed to Bay State aggressively retiring approximately 20 percent of its unprotected coated steel and approximately 12 percent of its bare unprotected steel main during that five year period.
- BSG-AG-2-36      Please refer to the Cavallo Testimony at p. 15, lines 8-12. (a) Has Mr. Cavallo conducted a "root cause analysis" of the cause of the "pinpoint" leaks in Bay State's bare steel and unprotected coated steel mains? (b) Provide such analysis. (c) If no such analysis exists, please describe the sources of pinpoint leaks analyzed other than "the poor quality of the bedding and backfill," and describe why Mr. Cavallo rejected them as the root cause of the leaks.